

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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**MAR 11 1996**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

In the Matter of:

Revision of the Commission's  
Rules To Ensure Compatibility  
With Enhanced 911 Emergency  
Calling Systems

CC Docket No. 94-102

**DOCKET FILE COPY ORIGINAL**

**Reply Comments of The Ericsson Corporation**

The Ericsson Corporation ("Ericsson") by its attorney, hereby submits its reply comments with respect to the Commission's request for additional comment on the "Consensus Agreement" submitted to the Commission by CTIA, APCO, NENA and NASNA as an ex parte presentation in the above-captioned proceeding. In support thereof, Ericsson states as follows:

Most parties filing comments on the Consensus Agreement agree that the goal of promoting wireless access to E911 services is a laudable goal and one which should be aggressively pursued. Furthermore, virtually all parties that submitted additional comments in this portion of the proceeding agree that E911 implementation should be based on two phases rather than three. Ericsson agrees with these positions. However, there is less consensus among the filers on the specific implementation proposals set forth in the Consensus Agreement.

For example, though many parties support the Phase I proposal in which wireless carriers would be required to provide cell site information using 7 or 10 digit psuedo-ANI and a 7 or 10 digit caller ANI depending on the local landline network's signaling

capability, numerous parties believe that 12-18 months may be an optimistic estimate of the time within which such capability can realistically be provided. Though Ericsson applauds the efforts made by CTIA, APCO, NENA and NASNA in developing the Consensus Agreement, it also believes implementation details should be fully evaluated by all affected segments of the telecommunications industry before final rules are adopted. In this regard, while Ericsson will strive to produce equipment capable of meeting the Commission's rules on E911 at the earliest possible time, it believes the views of Motorola and Nortel that the 12-18 month time frame may be optimistic<sup>1</sup> are accurate assessments.

With regard to Phase II, a number of parties raise the question of whether the 5 year time frame is realistic. Ericsson agrees with those parties that assert the 5 year time frame may be realistic but that all segments of the industry must carefully analyze the Phase II proposal before committing support to it. Among the factors that must be evaluated are those relating to whether systems using a variety of wireless technologies, air interfaces, re-use patterns and cell sizes can meet the Phase II requirements in a timely manner.

While the Phase II Consensus Agreement proposal may work with existing analog systems the same is not necessarily true for existing digital systems or digital systems that may be deployed in the future.<sup>2</sup> For example, the method for ALI determination referenced in the Consensus Agreement appears to be based on tests using analog AMPS. Similar test need to be carried out for digital interfaces. It may be necessary to use substantially different technologies for location determination for digital air interfaces

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<sup>1</sup> See, Motorola Comments, p. 5 and Nortel Comments, p. 3. See, also, PICA Comments, pp. 9-10.

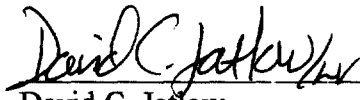
<sup>2</sup> See, for example, Motorola Comments, pp. 7-8 relative to TDMA and CDMA air interfaces.

which will likely result in a need for additional research. Also, the parties affected by the proposed Phase II rules must evaluate whether it is even possible to achieve 125 meter accuracy in urban environments which are subject to shadowing, multipath and similar phenomena, making triangulation difficult.

In conclusion, Ericsson supports the concept of implementing wireless E911 in two phases rather than three, but believes additional technical work must be performed by all segments of the industry before the Commission adopts proposals which have not been fully evaluated.

Respectfully submitted,

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March 11, 1996

## CERTIFICATE OF SERVICE

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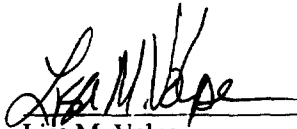
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